ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of	)	
	)	CC Docket No. 95-116
Telephone Number Portability	)	

COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION IN OPPOSITION TO PETITION FOR EXTENSION OF TIME OF SOUTHWESTERN BELL TELEPHONE COMPANY AND PACIFIC BELL

MCI Telecommunications Corporation (MCI), by counsel, hereby opposes the Petition

For Extension of Time of Southwestern Bell Telephone Company and Pacific Bell (collectively

referred to as SBC) (SBC Petition), filed on February 20, 1998.[1] The Petition seeks a delay of

local number portability (LNP) implementation for each of the first three phases of LNP

deployment ordered by the Federal Communications Commission (Commission).[2]

SBC seeks to delay LNP implementation as follows:

> Phase I delay requested from March 31 to May 26 (affecting Houston, TX and
> Los Angeles, CA)

---

[1] *Public Notice*, Common Carrier Bureau Seeks Comment on SBC Companies Petition For Waiver Under 47 C.F.R. § 52.3(d) And Petition For Extension of Time Of The Local Number Portability Phase I Implementation Deadline, CC Docket No. 95-116, N.D. File No. L-98-16 (rel. March 3, 1998). Although SBC Companies seek both an extension of the March 31 deployment date and a waiver of the 60-day waiver request filing deadline, the Common Carrier Bureau "seek[s] comment on SBC Companies Petition for Extension of the March 31, 1998, Phase I Implementation deadline." In addition to the Phase I deployment deadlines, MCI's comments focus on SBC's request for an extension of the Phase II and III deadlines as well, and, to a lesser degree, on the request for waiver of the 60 day waiver request deadline.

[2] *See In the Matter of Local Number Portability*, First Memorandum Opinion And Order On Reconsideration (rel. Mar. 11, 1997) (First Memorandum Opinion).

Phase II delay requested from May 15 to June 26 (affecting Riverside and San Diego, CA, Dallas, TX and St. Louis, MO)[3]

Phase III delay requested from June 30 to July 27 (affecting Orange County and San Fransisco, CA, Ft. Worth, TX, Kansas City, MO, and Las Vegas, NV)

SBC's Petition should be denied for several reasons, among them, it has failed to meet the Commission's extremely high standard for an extension of LNP deployment dates. Additionally, SBC's Petition should be denied for the following reasons: (1) SBC's claim that a delay is necessary due to an alleged failure of a DSC switch is disingenuous; (2) SBC's claim that the Signal Transfer Point (STP) does not properly process AIN-based services properly is inapposite, and has no bearing on LNP deployment; (3) SBC has ample time to test, load and deploy the network management software that it claims requires a delay of LNP; and (4) had SBC begun implementation and testing of its LNP capabilities in a timely fashion in the first place, it would have learned of the alleged problems sooner, and should not now be granted an extension due to its dilatory behavior; which would prevent other carriers and consumers in the affected metropolitan statistical areas (MSAs) from enjoying the benefits of LNP.

The Commission's First Report and Order and Further Notice of Proposed Rulemaking recognizes that the ability of consumers to retain their telephone numbers when changing local service providers promotes competition, provides flexibility in the quality, price and variety of telecommunications services and benefits all users of telecommunications services.[4] The

---

[3]As MCI will show, SBC has received the solution to the problem that it claims warrants a delay in Phase II deployment. *See* Affidavit of Delbert L. Duncan, p. 8.

[4]*In the Matter of Telephone Number Portability*, First Report And Order And Further Notice of Proposed Rulemaking, CC Docket No. 95-116, ¶ 30 (rel. July 6, 1996) (First Report and Order).

Commission has specifically stated that interim LNP methods are "far inferior" to the long-term Location Routing Number (LRN) LNP mechanism in that they are inefficient, often unreliable, wasteful of numbering resources and require new entrants to depend entirely on the networks of incumbent local exchange carriers (LECs), such as SBC, to provide service to customers.[5]

It is precisely because LNP is "essential to effective facilities-based competition in the provision of local exchange services"[6] that the Commission set an aggressive implementation schedule for LNP deployment. In fact, the Commission has declined to delay LNP in the past where delay was requested based on "speculative and unspecified concerns about possible future technical concerns."[7] The Commission has also declined to grant requests of LECs to obtain a waiver "if they cannot meet the schedule for reasons beyond their control."[8] In so doing, the Commission reasoned that the established waiver procedures for extending LNP deployment deadlines, coupled with the fact that the Commission extended the original deployment schedule for Phases I and II,[9] allowed sufficient time for LECs to take proper and timely steps to deploy LNP on schedule, and to notify the Commission at least 60 days in advance of the deployment deadline if it appeared that any particular deadline could not be met. Specifically, the Commission stated:

---

[5] *Id.* ¶ 115.

[6] *In the Matter of Telephone Number Portability,* First Memorandum Opinion And Order On Reconsideration, CC Docket No. 95-116, ¶ 90 (rel. Mar. 11, 1997) (First Memorandum Opinion).

[7] *Id.*

[8] *Id.,* ¶ 92.

[9] *Id.* ¶¶ 78, 80.

The waiver procedure established in the *First Report & Order* for extending deployment deadlines as necessary provides an effective vehicle for addressing any problems in implementing number number portability that LECs can document. We note that carriers may file petitions for waiver of the deployment schedule more than 60 days in advance of an implementation deadline, and thus receive relief earlier, if they are able to present substantial, credible evidence at that time establishing their inability to comply with our deadlines.[10]

The importance attached by the Commission to timely LNP deployment around the country cannot be overstated, and the Commission has made clear that the standard a carrier must meet in order to obtain a delay is extremely high indeed. Specifically, the Commission has held:

that carriers are expected to meet the prescribed deadlines, and a carrier seeking relief must present extraordinary circumstances beyond its control in order to obtain an extension of time. A carrier seeking such relief must demonstrate through substantial, credible evidence the basis for its contention that it is unable to comply with our deployment schedule. Such requests must set forth: (1) the facts that demonstrate why the carrier is unable to meet our deployment schedule; (2) a detailed explanation of the activities that the carrier has undertaken to meet the implementation schedule prior to requesting an extension of time; (3) an identification of the particular switches for which the extension is requested; (4) the time within which the carrier will complete deployment in the affected switches; and (5) a proposed schedule with milestones for meeting the deployment date.[11]

SBC's petition is based on the assertion that the STP hardware and software upgrades needed to perform LNP, which SBC has purchased from DSC Communications (DSC) have certain "testing defects."[12] SBC states that this STP hardware is used to perform Message Relay

---

[10]*Id,* ¶ 92. (Footnote omitted.)

[11]First Report and Order, ¶ 85.

[12]SBC Petition, p. 2.

Service (MRS), which routes Signaling System 7 (SS7) messages to the correct network for advanced network services such as Alternate Billing Services (ABS)/Line Information Data Base (LIDB), CLASS^{SM}, Voice Messaging Service, and Calling Name.[13] SBC further states that the DSC STP will be used for MSAs in Phase II, not Phase I, and beyond to provide the Location Routing Number (LRN) Database necessary to provide LNP[14]

According to SBC, these STP "defects" necessitate an extension of the LNP deployment schedule in Phases I, II and III. SBC attributes the defects specifically to:

> (1) the interoperability of the [MRS] with queries originating in GTE's network, (2) the inability of the STP to process certain AIN-based services properly, and (3) the failure of a recent DSC software release to properly perform certain LNP network management functions used to prevent network overload.

In support of its petition, SBC attaches the affidavits of Delbert L. Duncan and Sally D. Swan. These affidavits purport to describe the specific reasons why SBC could not have known about the need for a delay until late January,[15] and thus could not have met the Commission's 60-day waiver filing deadline. These affidavits also purport, in accordance with the Commission's required waiver request standards, to set forth the steps SBC and PB have taken to deploy LNP[16]

---

[13]*Id.*

[14]*Id.*

[15]*See* Affidavit of Delbert L. Duncan ("Duncan Aff."), p. 6.

[16]*See* Affidavit of Sally D. Swan. The bulk of Ms. Swan's affidavit is devoted to describing her career at SBC and defining industry-wide terms, such as "NPAC" and "STP". Paragraph 5, the single paragraph describing SBC's efforts to deploy LNP is woefully inadequate, and consists only of a few sentences and fails to provide any useful information regarding SBC's deployment efforts and activities. Since Ms. Swan's affidavit fails to contribute any useful or pertinent information, it should not be considered when ruling on SBC's petition.

Taken together, these affidavits are supposed to form the basis for the extension of time to deploy LNP in Phases I, II and III. For the reasons outlined below, neither SBC's petition, nor the attached affidavits, meet the Commission's standard for entitlement to an extension of the LNP deployment schedule. SBC's Petition should thus be denied.

I.   SBC's Claim That An Alternate Billing Services/LIDB Query Problem Requires A Delay Is Disingenuous.

Mr. Duncan's affidavit makes clear that all LIDB messages sent to the DSC STP[17], whether for ported customers or not, will undergo a process called a "10-digit lookup" in the MRS module.[18] This process was not defined in the Illinois LNP requirements, nor was it defined as a part of the Southwest Regional LNP Test Team. Rather, requiring a "10-digit lookup" in the MRS module is simply the manner in which SBC alone has chosen to implement LNP. Moreover, SBC's implementation for Houston and Los Angeles will limit the use of the DSC STP to performing 10-digit routing on SS7 non-call associated SS7 messages, and SBC will use the Bellcore database for LRN queries.[19] Stated another way, in Houston and Los Angeles, SBC will use the Bellcore database, with which there are no problems, to perform LRN queries for call processing purposes. As a result, the alleged problem with the 10-digit look-up associated with the STP does not provide ample basis for delay of deployment of LNP in those cities, since the problem is so small in scope. Furthermore, SBC's actually caused the problem,

---

[17]These LIDB messages are not call related, but are what the industry calls "non-call associated."

[18]*See* Duncan Aff., p. 6.

[19]*See* Duncan Aff., p. 6.

since it turned the feature off. Moreover, since SBC has received the fix from DSC for the STP problem from DSC[20], there is no good reason why it cannot now deploy LNP in Phases II and III on a timely basis as well. In sum, deployment in Houston and Los Angeles are minimally affected, if at all, by the alleged problem, and to the extent the problem exists, it can be resolved in time for timely LNP deployment in Phases II and III.

The 10-digit lookup STP translation process described by SBC expands the current processing of STPs performing LIDB SS7 Global Title Translations beyond the current 6-digit translation, and is necessary for LNP. SBC's implementation, however, foregoes performing a 6-digit lookup to pre-screening the message, and instead, sends all LIDB messages, whether affected by portability or not, to the portion of the DSC STP supporting LNP functions. Thus, SBC's network utilizes the LNP translation function for translating LIDB messages for current un-ported locales, as well as any determinations made for ported-in and ported-out end users in ported area. Had SBC chosen not to utilize the LNP translation function for this unrelated function, it would not be experiencing the problems it now claims require a delay in the LNP implementation schedule. SBC's unilateral decision to use the LNP translation for something additional to and not required for LNP implementation should not be allowed to delay LNP in SBC's region.

With the MRS feature turned on, any LIDB messages are routed to the DSC STP for translation and are subsequently sent to the 10-digit LNP module for treatment. Non-ported MSAs (and their affected telephone numbers) will not be noted in the MRS translation database.

---

[20]*See* Duncan Aff., p. 8.

The DSC STP will then revert back to default 6-digit translation as performed today for LIDB messages to locate the routing path to the LIDB database.

SBC claims that it suddenly recognized that it was unable to validate LIDB calling card queries from a particular switch in GTE's network when it connected the DSC STP to its live network on January 21, 1998.[21] According to Mr. Duncan's affidavit, the DSC STP failed because it did not support a new SS7 message parameter necessary to support a change GTE made to its switches to comply with a Commission order in an unrelated proceeding.[22]

SBC states that the problem necessitating the delay is related to steps taken by GTE to comply with the Commission's order to, on June 30, 1988, end the permissive dialing period during which 3- and 4-digit carrier identification codes (CICs) can be used to access the services of "dial around" carriers.[23] This Order served to extend the permissive dialing period, which was originally been set by the Commission in April 1997 to end on January 1, 1998.[24] Thus, the end to the permissive dialing period has been on the horizon since April 1997, and, simply stated, SBC should have begun testing earlier in order to account for upgrades performed by it and other carriers as a result of the Commission's order in that proceeding. SBC's petition should thus not be granted on this basis.

---

[21]*See* Duncan Aff., p. 7.

[22]*Id.*

[23]*See Administration of the North American Numbering Plan Carrier Identification Codes (CICs)*, CC Docket No. 92-237, Order on Reconsideration, Order on Application For Review, and Second Further Notice of Proposed Rulemaking and Order (rel. Oct. 22, 1997).

[24] *See Administration of the North American Numbering Plan Carrier Identification Codes (CICs)*, CC Docket No. 92-237, Second Report And Order (rel. Apr. 11, 1997).

SBC states that when the DSC STP received the GTE messages and submitted them to the LNP function for a 10-digit lookup, a failure occurred because the STP was not yet equipped to "recognize" the CIC Expansion Indication parameter that was contained in the message. It should be noted that the STP mechanism of performing a 10-digit lookup translation requires the STP to perform an analysis of the Transaction Capabilities Application Part (TCAP layer) of the SS7 protocol message, contrasted with the non-LNP LIDB 6-digit translation which does not. In a 10-digit LNP lookup, the 10-digit telephone number being "looked up" is contained in one of the TCAP parameters. Therefore, the presence of other parameters in the TCAP layer can affect the STP 10-digit translation if they are "unexpected." When the GTE LIDB queries problems were detected, turning off the LNP function in the STP then reverted the messages back to their previous 6-digit translation treatment, bypassing the LNP module.

This explanation makes it clear that the DSC STP problem noted by SBC would only affect 10-digit look-ups in MRS that also included CIC Expansion indicators. SBC has stated that this only happened when the CIC Expansion Indicator was sent by a single GTE switch. SBC did not state that their operator switches included the CIC Expansion indicator on LIDB queries originating in their network, nor from other CLEC switches when inter-company network testing was conducted. Thus the problem described by as requiring a waiver, is very limited in scope.

SBC has not quantified how many GTE or other LEC 10-digit look-ups containing the CIC Expansion indicator are affected, or how many messages with the unexpected parameter are received by SBC on a daily or weekly basis. Without this information, SBC's request is speculative at best. As stated by the Commission, "speculative and unspecified concerns about

possible future technical concerns" are insufficient to warrant a delay of LNP implementation.[25]

SBC's assertions do not rise to the level of specificity and significance to warrant a delay of the LNP deployment schedule.

It is significant to note that the problem described by SBC was not found during Houston LNP Inter-company Network Testing, which took place between February 2, 1998, and February 27, 1998. This means that it was determined before February 2, 1998, and therefore outside the 60 day filing window. It was up to SBC (and all other carriers) to implement LNP testing schedules that were flexible enough to respond to and correct problems such as those described by SBC. The fact that SBC waited until after January 21, 1998, to perform their LIDB testing, knowing full well that the deadline for filing a request for waiver was the end of January, should not constitute a valid reason to deny competition for Houston.

One final reason why the LIDB testing issue fails to support SBC's requested delay is that LIDB query failures are not unusual, and they can and do occur regularly in the industry. When they do, they usually occur in the context of an actual denial of the calling card, or other network problem, such as expiration of the timer for completing the LIDB query. In those instances, either the live operator or the system employed simply requests another form of payment. Thus, the calls passing through GTE's switches that are affected can be alternately billed as, for example, coin sent-paid calls, third party billed calls or collect calls. These methods can be employed to address SBC's problem. In the meantime, the LIDB testing need not result in delayed LNP deployment.

---

[25]*See* First Memorandum Opinion, ¶ 91.

Even if the Commission decides that the LIDB problem described by SBC is indeed as monumental as SBC claims, SBC appears to have received the solution to the problem,[26] from DSC on February 17th. Given SBC's knowledge of its implementation of the 10-digit lookup module being put into place for LIDB, SBC can test this quickly and continue the LNP deployment on schedule, and comply with the Commission CIC order as well.

II.   **SBC'S CLAIM THAT ADVANCED INTELLIGENT NETWORK (AIN) SERVICES DELAYS REQUIRE A DELAY IN LNP DEPLOYMENT IS INAPPOSITE, AND HAS NO BEARING ON LNP DEPLOYMENT.**

The AIN problem described by SBC is similar in nature to the LIDB problem in terms of its relation to the DSC STP MRS feature. SBC's AIN service uses the LIDB database for determining additional incoming call routing information for a particular 10-digit number. In the AIN call sequence, a database query, a LIDB GetData message, is launched from some other network node location in SBC's network toward the LIDB database via the STP. In order to get routed to the LIDB, the DSC STP needs to perform a translation to identify the SS7 address of SBC's LIDB database. As stated previously, when the MRS feature is being used, all LIDB messages are routed to the 10-digit lookup portion of the STP. When the STP MRS function receives the LIDB GetData message, it apparently fails the translation because it does not "recognize" this type of AIN message. Therefore, the SBC's AIN service failed. MCI does not agree with SBC's claims for a delay in portability as a result of this problem.

---

[26]*See* Duncan Aff., p. 8.

LEC AIN services are typically proprietary services and are thus not associated with services offered between networks. Indeed, SBC does not claim that this problem would affect any other company's network. Moreover, the failure is not due to the introduction of LNP, or the LRN specifications developed by the Illinois industry group. Rather, it was SBC's decision to utilize the service, and thus, it is SBC's responsibility to provide specifications for its vendors to configure the network so that it would comply with LNP requirements and the Commission's deployment schedule.

SBC's AIN problem is limited to SBC customers using a proprietary SBC AIN feature designed for SBC customers, whether associated with the switch where they reside, or ported to some other SBC switch. Thus, simply stated, SBC should have identified for DSC the requirements needed to uniquely support an SBC AIN service when the DSC MRS STP was introduced into SBC's network. The fact that this was not done has resulted in SBC's problems. Consumers and the industry should not now have to bear the consequences.

SBC asserts that the calls were delivered to the default number instead of the number where they expected them to be routed.[27] In other words, the calls were completed, thus making SBC's argument outside specious. If it is true, as appears to be the case, that SBC filed to test this critical AIN service in the lab before introducing it into the live network, SBC has actually created the problems it is now experiencing.

The introduction of LNP and the details associated with it did not cause SBC's call routing problems. Rather, by not paying attention to the details associated with LNP

---

[27]Duncan Aff., p. 7.

deployment, and by insisting on deploying LNP at the last minute, utilizing a testing schedule that started months after it should have, SBC has caused its own call routing problems. As a result, its petition should be denied.

III. SBC's ARGUMENT THAT SELECTIVE CODE GAP NETWORK MANAGEMENT DOES NOT SUPPORT ITS REQUESTED DELAY.

SBC's final basis for requesting a waiver is due to an alleged failure of the DSC interim Selective Code Gap feature. However, SBC already has the fix from its vendor[28], and should be able to verify its operation easily in the lab. SBC clearly has the ability to do so since, as noted in Mr. Duncan's affidavit, the "software was incorrectly handling certain SS7 parameter fields."[29] Moreover, SBC would certainly not apply SS7 stress tests to its live network since that type of testing could affect the reliability of normal live SS7 message routing.

Mr. Duncan's affidavit makes clear that this problem only affects the Phase II and subsequent deployment phases when the DSC MRS STP will be used for both non-call message routing and LNP LRN database use.[30] Thus, with respect to this particular problem, SBC has failed to state a case for extension of the LNP deadline of March 31, which applies to the Houston and Los Angeles MSAs. In any event, since SBC has in its possession the solution to the problem, it has ample time to conduct tests, load the STPs, and deploy LNP in compliance with the Commission's existing deployment schedule.[31]

---

[28]*See* Duncan Aff., p. 8.

[29]Duncan Aff., p. 7.

[30]*Id.*

[31]It is reasonable to anticipate that initial volumes of ported customers will be small, and will increase gradually with the passage of time. As a result, initial porting activities should not

IV. SBC'S TESTING PLAN IS NONSENSICAL, AND WARRANTS DENIAL OF ITS REQUEST FOR EXTENSION OF TIME.

SBC's proposed Houston MSA LNP Test Timeline includes plans to upgrade the Ladue and Kirkwood STPs, which will be used for St. Louis, with the 10.10 release, and have them ready on April 15, 1998. Yet, the Jackson and Wesleyan STPs, which will be used for Houston, will not be upgraded until 3 days later. These testing plans are unreasonable, since they call for upgrades in the reverse order in which they are needed. Stated another way, SBC's testing plan upgrades the St. Louis area STPs prior to the Houston STPs, yet Houston is the first MSA to deploy LNP.[32] The only logical conclusion to be drawn from SBC's testing plan is that it is designed to delay implementation of LNP in the largest MSAs, in direct contravention of the Commission's LNP implementation schedule, which is designed to deploy LNP first in the nation's largest MSAs.

Moreover, Exhibit D of SBC's Petition sets forth SBC's test timeline. The timeline is illogical, and clearly designed to delay LNP for as long as possible. For example, SBC claims that, for Houston, the interval between the LSR Due Date and the date when inter-company testing will end is 5 days, while in Kansas/Ft. Worth, the interval between the LSR Due Date and the date when inter-company testing will end is 28 days. Note also, for example, that intra-company testing in Houston is set to take 10 days, while intra-company testing in Kansas/Ft.

---

strain the SS7 network databases to the extent contemplated by SBC. SBC thus has more than enough time to confirm that SS7 network management controls on their DSC LNP LRN database are working properly.

[32]It is also significant to point out that according to Mr. Duncan, DSC's 10.10 patch will be generally available on March 27. *See* Duncan Aff., p. 8. Since that is the case, there is no reason to delay testing in Houston until April 18.

-14-

Worth is set to take 37 days. There is no good reason for this inconsistent and inefficient timeline. Since the exact same tests must be performed in each city, it should take the same amount of time to complete them in each city. Moreover, there are significant differences between the timing of testing in St. Louis and the timing of the testing in Dallas. Since both cities are in Phase II, they should be tested together on the same timeline.

Mr. Duncan's Affidavit states that "[t]he thirty day interval planned between [SBC's] first three phases provides the necessary time for processing any 'pent up' demand from new CLEC entrants, as well as conversions from Interim Number Portability to LNP."[33] This is a ridiculous basis upon which to delay LNP deployment in any city. This alleged "pent up" demand of customers waiting to enroll in CLEC services is speculative, and is simply SBC's attempt to construct yet another roadblock to the successful introduction of LNP in its service area.

Whatever demand there is for new entrants' services is not so large that it cannot be managed and controlled though the order exchange process employed by the participating local service providers. Moreover, even if there were "pent up" demand, forcing new entrants, and consumers, to wait even longer to experience local competition using long-term LNP methods would serve only to exacerbate the problem. In fact, MCI has told SBC on numerous occasions that it wishes to have longer than 90 days within which to convert customers from interim LNP to long-term LNP. SBC has consistently refused to enlarge this window. It cannot now be heard to complain that the compressed 90-day conversion window is cause to delay LNP.

---

[33]Duncan Aff., p. 8.

Finally, SBC claims to need to perform inter-company testing in all MSAs, even after the

testing is completed in Houston.[34] But inter-company testing is not a requirement for any region

(with the exception of Chicago, due to the Commission's mandate). MCI has already

successfully completed inter-company testing for Phase I in Houston, and SBC participated in

that testing. Therefore for subsequent MSAs, MCI should be allowed to go "live" immediately

after SBC completes its intra-company testing. There is neither a need nor a requirement for

MCI to "re-test" LNP capabilities with SBC, and SBC's desire to do so with other carriers should

not prevent MCI from deploying LNP in Houston in a timely fashion.

WHEREFORE, for the foregoing reasons, the Commission should deny SBC's petition

for waiver under 47 C.F.R. § 52.3(d), and its petition for an extension of the Phase I, II and III

LNP deployment deadlines.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

Donna M. Roberts
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, NW
Washington, DC 20008
(202) 887-2017

Dated: March 9, 1998

---

[34]*See* SBC Petition, Exhibit D.

CERTIFICATE OF SERVICE

I, John E. Ferguson III, do hereby certify that copies of the foregoing Comments of MCI in Opposition to the Petition for Extension of Time of Southwestern Bell Telephone Company and Pacific Bell in the Matter of Telephone Number Portability were sent, on this 9th day of March, 1998, via first-class mail, postage pre-paid, to the following:

ITS**
1919 M. Street, NW
Washington, DC 20554

Robert M. Lynch
Durward D. Dupre
Southwestern Bell Telephone
  & Pacific Bell Co.'s
One Bell Plaza
Suite 3703
Dallas, TX 75202

Nancy C. Woolf
Southwestern Bell Telephone
  & Pacific Bell Co.'s
140 New Montgomery Street
San Francisco, CA 94105

Robert Sutherland
Theodore R. Kingsley
1155 Peachtree St.
Suite 1700
Atlanta, GA 30309-3610

Andre J. LaChance
GTE
1850 M. Street, NW
Suite 1200
Washington, DC 20036

John Readen
Mobex Corporation Inc.
1150 18th Street, NW
Suite 250
Washington, DC 20036

Caressa D. Bennet
Dorothy E. Cukier
Bennet & Bennet, PLLC
1019 19th Street, NW
Suite 500
Washington, DC 20036

Mark J. O'Connor
Piper and Marbury LLP
1200 19th Street, NW
7th Floor
Washington, DC 20036

Glenn B. Manishin
Michael D. Specht
Blumenfeld & Cohen
  Technology Law Group
1615 M. Street, NW
Suite 700
Washington, DC 20036

Richard S. Whitt
Anne F. LaLena
Worldcom, Inc.
1120 Connecticut Ave., NW
Suite 400
Washington, DC 20036

John R. Assonzo
atty for Sprint Spectrum
  D/B/A Sprint PCS
4900 Main Street
12th Floor
Kansas City, MO 64112

Carole C. Harris
Christine M. Gill
McDermott Will and Emery
600 Thirteenth Street, NW
Suite 1200
Washington, DC 20005

Cathleen A. Massey
Douglas I Brandon
AT&T Wireless
1150 Connecticut Ave., NW
4th Floor
Washington, DC 20036

Richard J. Metzger
Emily M. Williams
ALTS
888 17th Street, NW
Washington, DC 20006

Kevin C. Gallagher
360° Communications Company
8725 W. Higgins Road
Chicago, IL 60631

Kathleen Q. Abernathy
David A. Gross
Airtouch Communications Inc.
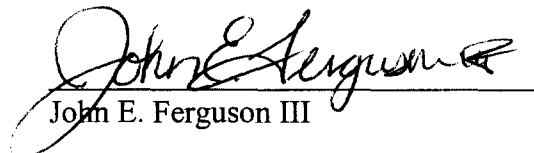1818 N. Street, NW
Washington, DC 20036

Alan R. Shark
Amer. Mobile Telecommunications Assoc.
1150 18th Street, NW
Suite 250
Washington, DC 20036

William L. Roughton
Primeco Personal Communications Inc.
601 13th Street, NW
Suite 320 South
Washington, DC 20005

Peter M. Connelly
Koteen & Naftalin
1150 Connecticut Ave., NW
Washington, DC 20036

HAND DELIVERED

John E. Ferguson III